



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

APR 21 1988

REPLY TO THE ATTENTION OF:

5WQC-TUB-8

CERTIFIED MAIL P 571 906 537
RETURN RECEIPT REQUESTED

Mr. William C. Axce
General Manager
BASF Corporation
Chemical Division
1609 Biddle Avenue
Wyandotte, Michigan 48192

Re: Administrative Order
Docket No. V-W-88-A0-31
Riverview, Michigan Site

Dear Mr. Axce:

U.S. EPA provided technical comments on BASF's proposed plan of study for the Riverview Site in a letter dated March 22, 1988. When I spoke with Mr. Keith Fry on April 19, 1988, concerning our comments and the current status of the plan, Mr. Fry indicated you had not received our letter. I have attached a copy of the letter for your review. After you review our comments, we request that BASF provide U.S.EPA with the current schedule for the implementation of the study.

If you have any additional concerns you wish to discuss, please call me at (312) 886-6703.

Sincerely yours,

Joan M. Arthur
U.S. EPA, Region V

Enclosure

cc: Leonard Lipinski, MDNR
Cathy Morse, MDNR
Bonnie Elder, U.S. EPA





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REPLY TO THE ATTENTION OF:

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Mr. William C. Axce
General Manager
BASF Corporation
Chemicals Division
1609 Biddle Ave.
Wyandotte, Michigan 48192

Re: Administrative Order
Docket No. V-W-88-A0-31
Surface Water Discharges
Riverview, Michigan Site

Dear Mr. Axce:

The purpose of this letter is to provide U.S. EPA's technical comments on your proposed plan of study for evaluating the extent to which pollutants are being discharged from the Riverview site to the Trenton Channel of the Detroit River. We believe that our comments will require only minor revisions and additions to your February 26, 1988 plan proposal and that BASF should, therefore, be able to begin implementation by April 1, 1988, or shortly thereafter.

Our comments on the proposed plan of study are as follows:

a) The temporary dam you propose should provide a good estimate of the amount of seepage that is occurring. As we would anticipate that seepage will increase during ground water periods, we recommend that at least one of the three seepage tests be conducted during the Spring. Additionally, your evaluation report should correlate seepage quantities to groundwater levels to the extent possible.

We assume that a procedure has been developed to assure that the temporary dam is removed in the event of an unexpected rainstorm. Is this correct?

b) Seepage samples should be analyzed for copper, iron, lead and zinc as well as the substances mentioned in the proposed plan. These metals were detected at noteworthy levels in the ditch and/or the seep samples collected by Leonard Lipinski in September 1985.

c) Just as in b) above, if test are run on seep from the other two ditches, we request that you test for copper, iron, lead and zinc in addition to the substances you proposed.

d) The methods you have proposed for estimating the quantity of storm water run-off are rather vague. We assume you will use statistics regarding average annual rainfall in the area, the size of the site, and the ratio of infiltration vs. run-off to draw up an overall estimate, and that you will verify these calculations (and the infiltration/run-off ratio) to the extent possible through field measurements. If this is not how you plan to proceed, would you call me and let me know what your thinking is?

e) For the reasons cited in b) above, the stormwater should be tested for copper, iron, lead and zinc in addition to the substances proposed by BASF. We do not anticipate that including these metals will significantly add to the cost of performing the study.

If you would like to discuss any of their comments, please call me at (312) 886-6766. I look forward to your successful implementation of the study and submission of the evaluation report.

Sincerely yours,



Robert G. Newport
U.S. EPA, Region V

cc: Leonard Lipinski, MDNR
Cathy Morse, MDNR
Bonnie Elder, U.S. EPA